

June 26, 2025

**BY ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *SEC v. Sun, et al.*, Case No. 1:23-cv-02433-ER (S.D.N.Y.)

Dear Judge Ramos:

Plaintiff Securities and Exchange Commission and Defendants Justin Sun, Tron Foundation Limited, BitTorrent Foundation Ltd., and Rainberry, Inc. (collectively, the “Parties”) jointly submit this status report and update pursuant to the Court’s entry of a stay in this matter.

Discussions about a final resolution of this matter remain ongoing. Accordingly, the Parties believe that a stay is still warranted.

The Parties will submit another joint status report within 60 days of this filing.

Respectfully submitted,

/s/ Adam B. Gottlieb  
Adam B. Gottlieb

Counsel for Plaintiff  
Securities and Exchange Commission

/s/ Jennifer Bretan  
Jennifer Bretan

Fenwick & West LLP  
Counsel for Defendants Justin Sun,  
Tron Foundation Limited,  
BitTorrent Foundation Ltd., and  
Rainberry, Inc.